

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

AUG 13 2019

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

MARTIN GUERRA  
SAUL DE LA GARZA

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Criminal No. M-19-1401-S1

**SUPERSEDING INDICTMENT**

**THE GRAND JURY CHARGES:**

On or about June 27, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**MARTIN GUERRA  
and  
SAUL DE LA GARZA**

did fraudulently and knowingly export and send from the United States, or attempt to export and send from the United States, any merchandise, article, or object, to wit: one (1) AR-15 style rifle and two (2) Glock 19 pistols, contrary to Title 22, United States Code, Sections 2778(b)(2) and (c) and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, 127.1, and 127.3, a law and regulation of the United States.

In violation of Title 18, United States Code, Sections 554(a) and 2.

**NOTICE OF FORFEITURE**  
**18 U.S.C. § 554**

Pursuant to 19 U.S.C. § 1595a (d) and 28 U.S.C. § 2461 the United States gives notice to defendants,

**MARTIN GUERRA  
and  
SAUL DE LA GARZA**

that upon conviction of a violation of 18 U.S.C. 554, as charged in this Indictment, all merchandise exported or sent from the United States or attempted to be exported or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the exporting or sending of such merchandise, the attempted exporting or sending of such merchandise, or the receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation shall be forfeited to the United States and includes, but is not limited to the following:

one (1) AR-15 style rifle and two (2) Glock 19 pistols

A TRUE BILL

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**FOREPERSON**

RYAN K. PATRICK  
UNITED STATES ATTORNEY

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**ASSISTANT UNITED STATES ATTORNEY**

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